

AB-1663 US
S.N. 09/850,367IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**RECEIVED
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Applicant(s): Jin-Ho Ha, Hee-June Kwak**Title: Liquid Crystal Display Device and Method for Assembling the Same****Serial No.: 09/850,367****Filing Date: May 8, 2001****Examiner: Hoan C. Nguyen****Group Art Unit: 2871****Docket No.: AB-1663 US****Confirmation No.: 2543**Irvine, California
November 21, 2006**Via Facsimile to (571) 273-8300**Mail Stop AF
COMMISSIONER FOR PATENTS
P.O. Box 1450
Alexandria, VA 22313-1450**PRE-APPEAL BRIEF REQUEST FOR REVIEW**

Dear Sir:

In response to the Office Action mailed July 24, 2006, please enter the following remarks.

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REMARKS

Claims 34-42 and 50-52 are pending after amendment. Applicant respectfully requests reconsideration and reexamination of the pending claims. Applicant has filed this pre-appeal brief request for review in light of the following clear error in the July 24, 2006 final office action.

I. The drawings clearly show the features of the claims

The Office Action of July 24, 2006 ("the Office Action") alleges that the drawings do not show every element of the claims. Particularly, on page 2, the Office Action alleges that the figures do not show a printed circuit board disposed outside the mold frame (claims 34, 50, and 52), and do not show an opening of the mold frame exposing a center portion of the bottom surface of the bottom chassis (claim 36).

This is a clear error, since these features are each illustrated in the figures. For example, FIG. 4 shows a cross-sectional view illustrating the mold frame 600 assembled with bottom chassis 300, so that the rear surface of bottom chassis 300 is exposed through the opening in the bottom surface of the mold frame 600. Note that the bottom surface of the bottom chassis 300 is illustrated as being flush with the bottom of mold frame 600 in the example of FIG. 4. PCB 500 and PCB 400 are both illustrated as disposed outside the mold frame.

The Advisory Action of October 5, 2006 ("the Advisory Action") alleges that FIGS. 3 and 4 are inconsistent, and so the objection to the drawings should stand. However, there is no ambiguity as to the position of PCBs 400 and 500 as shown in FIG. 4: they are disposed outside mold frame 600. The Advisory Action admits that FIG. 4 illustrates PCBs 400 and 500 under bottom chassis 300. Therefore, the objection to the drawings based on the failure to illustrate a printed circuit board disposed outside the mold frame is clearly in error.

Further, with reference to FIG. 3, the specification notes:

The printed circuit board 500 (hereinafter, referred to as an inverter board) for supplying the power source and the printed circuit board 400 (hereinafter, referred to as an A/D board) for converting signals are mounted on the rear surface of the bottom chassis 300 which is exposed through the opening in the bottom surface of the mold frame 600.

That is, the placement of printed circuit board 500 and printed circuit board 400 is on the surface of bottom chassis 300 that is exposed through the opening in mold frame 600. Thus, the allegation that FIG. 3 illustrates PCBs 400 and 500 placed directly on bottom chassis (on the side of bottom chassis 300 opposite mold frame 600) is in error. Since FIG. 3 is an exploded perspective view from the top, the only way to illustrate the positions of PCB 400 and PCB 500 is with an indication on the viewable side.

The Office Action also alleges that the drawings do not illustrate that the opening in the mold frame exposes a center portion of the bottom surface of the bottom chassis. However, this feature can be clearly seen in the examples of FIG. 3 and FIG. 4. Referring to FIG. 4, the opening of mold frame 600 exposes the center portion of bottom chassis 300 between the vertical and bent edge portions of bottom chassis 300. Since this feature is clearly shown in the figures, the contrary allegation in the Office Action is in error.

II. The Yamamoto and Takeishi references do not teach the elements of independent claims 34, 50, and 52

We first note that the Advisory Action introduces a broad definition of the term "receiving." However, even assuming that this definition is applied to the claims, the rejections are in error because the Yamamoto and Takeishi references do not teach the elements of independent claims 34, 50, and 52. In particular, neither Yamamoto nor Takeishi teach an LCD device having a bottom chassis receiving a display unit and a mold frame receiving the bottom chassis, where the bottom chassis has a bottom surface exposed through an opening in the mold frame, as well as a PCB disposed on the bottom surface. Each of the pending independent claims includes these features.

Turning first to Yamamoto, we note the following from the Office Action: display panel 11 of Yamamoto is identified as the display unit of the claims, element 25 of Yamamoto is identified as the bottom chassis, molding frame 18 of Yamamoto is identified as the mold frame, element 17 of Yamamoto is identified as the opening, and printed circuit board 15 of Yamamoto is identified as the printed circuit board.

Turning now to the figures of Yamamoto, it is clear that the above-identified elements do not have the claimed relationship, even using the suggested definition for the term "receiving." In Yamamoto, display panel 11 and element 25 (identified as the

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bottom chassis) are on opposite sides of molding frame 18. Yet, according to the claims, the bottom chassis receives the display unit, and the mold frame receives the bottom chassis. If the display of Yamamoto is positioned so that the bottom chassis "supports the weight or pressure of" the display unit (which it would do in the illustrated position), molding frame 18 would not be supporting the weight or pressure of element 25. The opposite would be true: element 25 would be supporting the weight or pressure of molding frame 18. On the other hand, if the display is positioned so that the molding frame 18 supports the weight or pressure of element 25 (i.e., by turning the display upside down), the bottom chassis would not support the weight or pressure of the display unit.

Further, it does not appear that any surface of element 25 would be exposed

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